

1
2
3
4
5
6
7
8
9
10
11
12
13 THE HONORABLE MARSHA J. PECHMAN
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUONG HOANG, an individual

Plaintiff,

v.

AMAZON.COM, INC., a Delaware corporation, and IMDB.COM, INC., a Delaware corporation,

Defendants.

No. 2:11-CV-01709-JCC

**DECLARATION OF ASHLEY LOCKE
IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER QUASHING
NOTICE OF DEPOSITION OF
KATHRYN SHEEHAN**

I, Ashley Locke, hereby declare as follows:

1. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. ("Defendants") in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. Attached as Exhibit A is a true and correct copy of document Bates IMDB000945-46, which is an email string dated November 12, 2008 between Kathryn Sheehan, Adrian Garver, and Giancarlo Cairella. This is the only email relevant to the above-captioned case on which Ms. Sheehan appears.

DECLARATION OF ASHLEY LOCKE IN
SUPPORT OF MOTION FOR PROTECTIVE
ORDER (NO. 2:11-CV-01709) – 1

24976-0480/LEGAL24291734.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

3. Attached as Exhibit B is a true and correct copy of IMDb.com's privilege log in the above-captioned case, which describes Exhibit A as: "Email string reflecting request for a provision of legal advice regarding Plaintiff's birth date, between G. Cairella, (IMDb.com), A. Garver (Amazon.com legal department), and K. Sheehan (Amazon.com in-house counsel)."

4. Attached as Exhibit C are true and correct copies of deposition notices from Plaintiff's counsel to Defendants' counsel and the cover email from Pollard to Roos dated July 20, 2012.

5. Attached as Exhibit D is a true and correct copy of an email from Jackson to Roos dated July 25, 2012.

6. Attached as Exhibit E are true and correct copies of a letter from Roos to Jackson dated July 30, 2012 and the cover email dated the same date.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: August 1, 2012

By: /s/ Ashley Locke
Ashley A. Locke

**DECLARATION OF ASHLEY LOCKE IN
SUPPORT OF MOTION FOR PROTECTIVE
ORDER (NO. 2:11-CV-01709) - 2**

24976-0480/L.EGAL24291734.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1
2
3
CERTIFICATE OF SERVICE
4
5
6
7
8
9

I certify that on August 1, 2012, I electronically filed the foregoing **DECLARATION
OF ASHLEY LOCKE IN SUPPORT OF MOTION FOR PROTECTIVE ORDER
QUASHING NOTICE OF DEPOSITION OF KATHRYN SHEEHAN** with the Clerk of the
Court using the CM/ECF system, which will send notification of such filing to the following
attorneys of record

14 **John W Dozier , Jr**
15 Dozier Internet Law
16 301 Concourse Blvd
17 West Shore III , Ste 300
18 Glen Allen, VA 23059
19
20

Via hand delivery
 Via U.S. Mail, 1st Class, Postage Prepaid
 Via Overnight Delivery
 Via Facsimile
 Via Email
 Via ECF

21 **Randall Moeller**
22 **Derek Alan Newman**
23 Newman & Newman
24 1201 Third Avenue, Ste 1600
25 Seattle, WA 98
26
27

Via hand delivery
 Via U.S. Mail, 1st Class, Postage Prepaid
 Via Overnight Delivery
 Via Facsimile
 Via Email
 Via ECF _____

28
29 I certify under penalty of perjury that the foregoing is true and correct.
30
31 DATED this 1st day of August, 2012,
32

33 /s/ Ashley Locke
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51

 Ashley Locke, WSBA No. 40521
 Perkins Coie LLP
 1201 Third Avenue, Suite 4800
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000
 E-mail: alocke@perkinscoie.com

 Attorneys for Defendants Amazon.com, Inc.
 and IMDb.com, Inc.

DEclaration OF ASHLEY LOCKE IN
SUPPORT OF MOTION FOR PROTECTIVE
ORDER (NO. 2:11-CV-01709) – 3

24976-0480/LEGAL24291734.1

Perkins Coie LLP
 1201 Third Avenue, Suite 4800
 Seattle, WA 98101-3099
 Phone: 206.359.8000
 Fax: 206.359.9000